

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN L. PUTNAM,
[DOB: 12/06/1954]

Defendant.

No. 17-CR-03119-RK

18 U.S.C. § 1001(a)(1)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

\$100 Mandatory Special Assessment

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

Introduction

1. At all relevant times, the defendant, **JOHN L. PUTNAM**, was an individual being interviewed by Special Agent (SA) Scott Wells, with the Internal Revenue Service-Criminal Investigation (IRS-CI), a federal agency with the United States Government.

2. During the interview, the defendant was advised that the purpose for the interview was to obtain material information regarding Marty Layne Brickey from the defendant, specifically concerning Brickey's involvement in committing a fraud to deceive others and obtain monies intended for investment into the development of a video game.

3. The defendant was informed that his answers to the questions should be truthful and complete with regards to his association with Marty Lane Brickey.

4. At all relevant times, the interview of the defendant and the ongoing investigation of Marty Lane Brickey was a matter within the jurisdiction of the IRS-CI, and IRS-CI is a department within the executive branch of the Government of the United States.

CHARGE

(Scheme to Conceal Material Fact from a Government Agency)

18 U.S.C. § 1001(a)(1)

5. The allegations set forth in paragraphs 1 through 4, are hereby incorporated in full.

6. On or about April 1, 2013, the defendant, **JOHN L. PUTNAM**, in Greene County, in the Western District of Missouri, and elsewhere, did willfully and knowingly, falsify, conceal, and cover up by trick, scheme, and device, a material fact in a matter within the jurisdiction of a federal agency within the executive branch of the Government of the United States, which he had a legal duty to disclose, through the following acts:

a. The defendant was interviewed by IRS-CI SA Scott Wells, regarding an ongoing criminal investigation into a fraud scheme involving Marty Layne Brickey;

b. During his interview, SA Scott Wells informed the defendant that his response to any questions must be truthful, accurate, and should not conceal or otherwise mitigate the business relationship between the defendant and Marty Layne Brickey;

c. During his interview with SA Scott Wells, the defendant stated that he had traveled to the country of Brazil and met with Marty Layne Brickey on one prior occasion;

d. The defendant concealed the material fact that he had, as he then and there knew, traveled to and met with Marty Layne Brickey on at least three prior occasions;

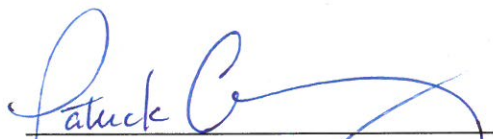
e. The concealment of this information by the defendant was material to the ongoing investigation by IRS-CI; and

f. The defendant concealed this material information from IRS-CI in an effort to mitigate the true nature of the defendant's association with Marty Layne Brickey.


7. All in violation of Title 18, United States Code, Section 1001(a)(1).

Respectfully submitted,

THOMAS M. LARSON
Acting United States Attorney



PATRICK CARNEY
Assistant United States Attorney



CASEY CLARK
Assistant United States Attorney

DATED: 11/1/2017
Springfield, Missouri